

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

:

PROTECTIVE ORDER

- v. -

:

S4 15 Cr. 867 (RMB)

REZA ZARRAB,

:

a/k/a "Riza Sarraf,"

MEHMET HAKAN ATILLA,

:

MEHMET ZAFER CAGLAYAN,

:

a/k/a "Abi,"

:

SULEYMAN ASLAN,

:

LEVENT BALKAN,

:

ABDULLAH HAPPANI,

:

MOHAMMAD ZARRAB,

:

a/k/a "Can Sarraf,"

:

a/k/a "Kartalmsd,"

:

CAMELIA JAMSHIDY,

:

a/k/a "Kamelia Jamshidy," and

:

HOSSEIN NAJAFZADEH,

:

Defendants.

:

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/15/17

WHEREAS the United States of America, Joon H. Kim, Acting United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Michael D. Lockard, Sidhardha Kamaraju, David W. Denton, and Dean Sovolos, Special Assistant United States Attorney, seeks an order restricting the dissemination of material produced pursuant to the Jencks Act and *Giglio v. United States*, 450 U.S. 150 (1972) and its progeny ("3500 Material") in connection with the trial in this matter that is scheduled to begin on November 27, 2017 (the "Trial");

WHEREAS the Court finds that the application for an order demonstrates good cause for the relief set forth herein;

IT IS HEREBY ORDERED that defense counsel of record ("Defense Counsel")

to whom 3500 Material is disclosed shall not show or disseminate any of the 3500 Material to anyone other than the defendant and U.S.-based paralegals, investigators, and interpreters working for Defense Counsel;

IT IS FURTHER ORDERED that, with respect to 3500 Material concerning Individual-1 (the "Restricted Materials"), the defendant shall be granted access only to redacted versions of the Restricted Materials, and access to the Restricted Materials shall be further limited to Defense Counsel as well as U.S.-based investigators and interpreters working for Defense Counsel, each of whom shall acknowledge the provisions of this Stipulated Order in a signed writing;

IT IS FURTHER ORDERED that Defense Counsel shall not transport or transmit or permit to be transported or transmitted any of the 3500 Material outside of the United States;

IT IS FURTHER ORDERED that the defendant shall not possess any of the 3500 Material, either before, during, or after the Trial, except when reviewing the 3500 Material in the presence of Defense Counsel or U.S.-based paralegals, investigators, or interpreters working for Defense Counsel, nor shall the defendant retain any copies, notes, extractions or reproductions based on or derived from the 3500 Material and all such copies, notes, extractions or reproductions shall be maintained by Defense Counsel; and

IT IS FURTHER ORDERED that Defense Counsel shall return to the Government, or destroy, all of the 3500 Material at the close of the Trial or when any appeals have become final.

SO ORDERED:

RMB

HONORABLE RICHARD M. BERMAN
UNITED STATES DISTRICT JUDGE

November 15, 2017

Date